

# **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
UNITED STATES OF AMERICA,  
Plaintiff,  
-v- Case No. 1:20-cv-502  
Hon. Robert J. Jonker  
DARRELL JONES, FATIMA JONES, and  
JONES INVESTING, LLC,  
Defendants.

\_\_\_\_\_/

VIDEO DEPOSITION OF DARRELL JONES  
APPEARING REMOTELY FROM  
KENT COUNTY, MICHIGAN  
TUESDAY, AUGUST 31, 2021  
9:06 A.M.

REPORTED BY:  
Suzanne Duda, CSR-3199, RPR, CRR, Notary Public  
Appearing Remotely From Clinton County, Michigan  
Video Technician: Brad Holt

1 can't remember how it is.

2 Q What aspects of the business are you responsible  
3 for, Mr. Jones?

4 A I'm the -- responsible -- if people call me and say  
5 they want a -- want a -- want a house, if I had a  
6 house available, I tell them yeah. And -- and I --  
7 my wife gives me the thing to give to them. I have  
8 them fill it out. I take it back to her, and she  
9 looks at -- looks at it, checks it all out, and she  
10 tells me if we can rent to them or not.

11 And then -- and then I -- I call them and  
12 tell them they got it or they didn't get it. If  
13 they got the money, boom, you got it.

14 So my wife -- that's the --

15 Q So you -- do you show the properties?

16 A Yeah, I -- I -- I open the door and let them go in  
17 there, and I go get back in my truck. I make them  
18 wait till I go back into my truck.

19 If I ain't got nobody with me, that's  
20 what I always do. I usually take somebody with me.

21 Q Do you collect the rent?

22 A Yeah, they bring it to me. Yeah. They call me,  
23 tell me the -- the rent, they got the rent, come to  
24 the house. I'll pull up front, they come outside,  
25 give it to me, I'm gone. Unless they tell me

1       they'll meet me somewhere.

2   Q   Who is the final decision-maker on who -- on  
3       whether you choose to rent to someone or not, you  
4       or Fatima?

5   A   My wife. She -- she's the one look at they money  
6       and see if they got enough money. She tells me if  
7       they got -- they got enough money to rent the  
8       house. Enough income.

9   Q   Who makes the final decision on whether to start  
10      the eviction process?

11   A   I -- I tell my wife they ain't paid me, and I --  
12      and I give them, supposed to be, like, three days.  
13      They said I didn't -- supposed to give them a  
14      30-day notice. I tell my wife about. But usually  
15      I went back two weeks. If I ain't heard from the  
16      person, I tell my wife to give them a 30-day  
17      notice, and she sends it to them in the mail.

18               And if I haven't heard from them, we give  
19      it to the lawyer, she give it to the lawyer. I put  
20      them out. I'll put whoever out. I'll put you out  
21      if you don't pay me.

22   Q   Understood. How many sets of keys do you keep for  
23      the properties that you rent?

24   A   How many dozen keys?

25   Q   How many sets of keys do you have for each

1        didn't pay me. And that's why they ain't living in  
2        my house.

3    Q        So if a tenant hands you cash, how do you make sure  
4        it's the right amount?

5    A        They give me their money, I take it back to my  
6        wife, my wife let me know.

7                I know how to count my money, I just -- I  
8        can't read and write.

9    Q        Got it.

10   A        If the rent \$700, I know \$700 when I see it.

11   Q        What is your policy on accepting late payments?

12   A        Late payments.

13   Q        Yes. What if a tenant is late on their rent?

14   A        If they -- well, I have -- we all have policies  
15        they pay 50 -- I think it's \$50 or \$75, whatever,  
16        for being late, whatever, but I never enforced  
17        that. They all have -- every month my tenants is  
18        just about late; you know what I'm saying? And  
19        they still been there -- they been there for years.  
20        Ten or more years. And they just call me and they  
21        pay me. As long as I get paid me, that's all me  
22        and my wife want. All we want to do is get paid.

23   Q        How long do you wait for payments --

24   A        Two weeks. Two weeks.

25   Q        Two weeks?

1 A Yep. If I ain't heard from you in two weeks --  
2 it's supposed to be three days. But if I ain't  
3 heard from you in -- if you been living -- renting  
4 from me for a long time, I'm not going to worry  
5 about it because I know you pay your rent.

6 But if I got somebody been in my house,  
7 they're a new customer, I don't know what they  
8 might do. So I'm not going to wait two weeks. I'm  
9 going to wait maybe a week, and then I'm telling my  
10 wife to give them a 30-day notice just to wake them  
11 up and remind them that they got to pay me their  
12 rent, you know.

13 So after that I don't hear nothing from  
14 them, hey, guess what? The lawyer got it. It's  
15 too late then. You got to pay me lawyer's fee  
16 because I'm not paying for lawyer's fee. I'm going  
17 to have to pay them anyway. So you either pay me  
18 if you want to stay and pay your rent, then bam.  
19 Good.

20 Q Do you ever allow tenants to pay, like, installment  
21 payments like --

22 A I don't allow no tenants to do nothing. I would  
23 like all my money at one time. But I can't control  
24 what they do.

25 If they come out and got half of their

1           understand.

2                       When you said -- are you talking about

3           when she rented from me? Are you talking about

4           when she rented from me?

5   Q     I understand that she met you -- that you -- she

6           looked at two properties.

7   A     Right.

8   Q     So there would be a first time and a second time.

9           I'm asking if you ever met her anywhere else --

10  A     That's why -- that's why I want to clarify.

11  Q     -- other than your rental properties? Yes.

12  A     Sorry about that. I'm just trying to clarify what

13           you're asking me --

14  Q     Sure.

15  A     -- to make sure I answer correctly.

16  Q     Yep. So --

17  A     When I rented -- when I rented out -- when I rented

18           that house to her, right, I did not know that woman

19           other than the time when she came that we looked at

20           the house. And then I rented --

21  Q     Okay.

22  A     -- my house to her. Then I rented the house --

23           hold up. I want to make sure we understand.

24                       I rented the house to her. And she

25           rented my house from me. And when -- she met me

1 house, they call -- they call my phone. That's how  
2 everybody call my phone. I never knew her before.

3 Q So your phone number is the one listed in  
4 advertisements about your properties?

5 A Every -- yep.

6 My -- my house is in bad areas. I don't  
7 want my wife being involved with that. I deal --  
8 they call me. That's how we -- that's how they get  
9 the -- to rent and see my house. That's how I --  
10 they -- they chose to rent from me.

11 Q Did you ever see Ms. Shephard in a liquor -- in a  
12 parking lot?

13 A I might have. I mean, because I -- you know, I had  
14 to meet them somewhere in a public place when  
15 she -- when she fill out her thing. And I talked  
16 to my wife, and my wife decided to give her a  
17 chance.

18 And I met her somewhere. I don't know if  
19 it was a bank or -- or a store, a liquor store  
20 parking lot, I don't know. I can't remember  
21 exactly where I met her. But she gave her money to  
22 me, and I rented the place to her.

23 Q And at some point you showed her the property; is  
24 that correct?

25 A Yeah. I always -- yeah. They go to the house and



1 A No, ma'am.

2 Q Do you ever see Ms. Moore at the Olive Garden?

3 A No, ma'am.

4 Q Is there an Olive Garden near you?

5 A There's one in Muskegon. Yes, there is.

6 I could have been -- I could have been at

7 Olive Garden, and she could have been there and I

8 wouldn't never known it. But I never met her there

9 or anybody going to Olive Garden.

10 Q So you've been to the Olive Garden to eat?

11 A I go to Olive Garden a lot of times. Red

12 Lobster -- I go to Red Lobster's -- used to go

13 there three times a week, something like that.

14 Used to go to Olive Garden all the time.

15 I like -- I like to sit down and eat my

16 food. I sit at the bar, unless I go with me and my

17 wife. We eat at the bar sometimes, we sit down.

18 But I have never met her there. Never

19 took her to dinner. Never did nothing.

20 Q Did you ever tell Ms. Moore that you wanted to have

21 sexual relations with her?

22 A No, ma'am. No, ma'am.

23 Q Did she ever tell you that she wanted to have sex

24 with you?

25 A No, ma'am.

1       here. She tried to make it just be about the dogs.  
2       You know what I'm saying?

3               So she told me, Okay, I'm going to write  
4       the thing for you, and I'll call you when I'm  
5       ready.

6               Well, found out from some of my -- one of  
7       my cousins, she told me the next morning that she  
8       went on Facebook and say, Do any -- do anybody know  
9       how to get my rent money from my landlord? And she  
10      gave me -- I told her meet me at The UPS Store so I  
11      can get the post. She gave it to me, and I gave it  
12      to my wife.

13              And come to find out, the guy that she  
14      talk about in that thing when she did her thing was  
15      my cousin. He asked her, Why are you talking about  
16      him like that and -- and -- and -- and you sent  
17      him -- and you sent him naked pictures?

18              That's who she talking about, she talking  
19      about my cousin. His name is Joe Savage, which is  
20      my cousin Angie Savage's brother.

21   Q       So she -- your testimony is that she sent you the  
22       photo before she made the post, Facebook post?

23   A       She sent the photo to me. My -- my -- my -- my --  
24       my -- my -- she sent the photo to me. I believe  
25       that she sent the picture to me first. I'm almost

1 positive.

2 I can't remember everything, ma'am. But  
3 so much shit happened with her living in the house  
4 that was like -- she was totally -- she real  
5 aggressive. She wanted to try to talk to me. I  
6 think she think she going to be staying there free  
7 or something. Whatever. A lot of these women is  
8 like that. They think they try to look -- talk to  
9 their landlords, they going to be staying free.

10 And she had a boyfriend --

11 Q Did she --

12 A -- staying there.

13 Q Did she text you the photo?

14 A I don't know how -- all I know, that she told me  
15 she sent me a picture. And I went to The UPS  
16 Store, went to the phone place, and the guy pulled  
17 the phone -- a picture up for me. I showed it to  
18 my wife, just like I did the same thing with what's  
19 her name.

20 So I don't know how she sent it to me,  
21 you know. You have to ask her. She admitted that  
22 she sent the pictures to me.

23 Q So when you --

24 A And I know you're aware of that.

25 Q When you pulled the photos up of Ms. Williams, was

1 A Ma'am, I -- ma'am --

2 Q -- do you call someone on your phone?

3 A Let me -- let me explain something to you.

4 I can't read and write, but -- okay? --

5 but I can dial the phone. Okay? I dialed -- I

6 dialed her number. Okay? She just had called me.

7 I called her back and told -- she told me that

8 she's giving my rent money to me.

9 I called her back and told her that --

10 once my niece had gotten the money, I told her --

11 then I told her that she had to move. Because I

12 didn't like it. I told her move out of the -- I

13 want her to move out of my house. I wanted her to

14 write me a thing. And when she did and when she --

15 when she moved out, I gave her her deposit back. I

16 had my wife write her a check to give her the

17 deposit back.

18 Q So part of the reason you evicted her -- or I don't

19 want to put words in your mouth. What was the

20 reason you evicted her?

21 A Beg your pardon?

22 Q What was the reason you evicted Ms. Coleman?

23 A I -- I evicted her because she -- every time I

24 talked to her she was saying sexual things to me.

25 When she paying me her rent, she always making

1       houses at night. If they call me and say they have  
2       a problem, I'll send somebody to fix it, or they  
3       wait till the next day.

4   Q   Did Ms. Coleman ever tell you she felt unsafe?

5   A   Ain't never told me nothing. I ain't never had a  
6       conversation with that woman other than that I told  
7       her -- I told her I -- I -- I feel like she -- she  
8       doing things inappropriate. I ain't -- I ain't  
9       appreciate she sent that picture to me.

10  Q   Other than sending you that photo, what else did  
11       she say to you that was inappropriate?

12  A   A lot of stuff. I can't remember everything.

13               But the bottom line, ma'am, she did  
14       things inappropriate, you know, and I felt like it  
15       was time for her to leave.

16  Q   So your testimony is that she said a lot of  
17       inappropriate things to you, but you can't remember  
18       what any of them are?

19  A   Listen, ma'am. I'm going to say this to you one  
20       more time. I can't remember everything she said to  
21       me. I'm telling you --

22  Q   I understand you can't remember everything.

23               Can you give me some examples of some  
24       things?

25  A   Okay. Nothing right now. It's too long. Too

1 long, but too much time go by.

2 I wouldn't even be thinking about this  
3 stuff if it weren't for you all. But it's a good  
4 thing that my cousin still had that picture and my  
5 wife still had that picture. That post.

6 Q So this woman sent you a naked photo and said  
7 inappropriate things to you, and as you sit here  
8 today, you can't remember one single thing that she  
9 said to you?

10 A Ma'am, what you -- look. I'm telling you what I  
11 believe. I can't remember a lot of things. I have  
12 a problem, okay, remembering stuff. So I'm telling  
13 you right now I cannot remember. It been too much  
14 time that passed by. But luckily, you know, my  
15 wife had that.

16 MS. MURPHY: Okay. You can take that  
17 exhibit down.

18 Okay. Can you pull up the document  
19 Number 5?

20 Q (MS. MURPHY) Okay, Mr. Jones, is this the  
21 document -- is this the photo that you claim  
22 Ms. Coleman sent to you?

23 A I don't -- the picture that she sent -- sent me is  
24 a picture that you would see where you see her  
25 vagina, ma'am. That picture right there, it's

1 Q Did you ever sue Ms. Totten?

2 A Did I sue her?

3 Q Yes.

4 A I evicted her.

5 Q So you -- you -- you brought an eviction action

6 against her; is that correct?

7 A That's right. That's correct. You let you -- I

8 let you know right there. If you don't pay me, I'm

9 putting you out.

10 Q Okay. You evicted her for nonpayment?

11 A Yep. She's still my niece though.

12 Q Do you remember --

13 A Huh?

14 Q Go ahead. What were you going to say?

15 A I ain't going to say nothing.

16 MR. BOSCH: He said, "She's still my

17 niece."

18 THE WITNESS: Still my niece.

19 If you was my niece, I'll put you out

20 too, so don't feel bad.

21 Q (MS. MURPHY) You know, I think -- I think I believe

22 you at this point.

23 A I'm telling you.

24 Q Mr. Jones, did you ever file another lawsuit

25 against Ms. Totten or name her as a defendant in a

1 lawsuit?

2 A I don't know. Ask that question -- I think my  
3 brother might have did that. It wasn't me.  
4 Whatever he did, he did it.

5 Q Did he tell you he was going to name her in a  
6 lawsuit?

7 A He may have. He may have not. He -- he did a lot  
8 of stuff for me --

9 Q Is your answer that you don't remember?

10 A That's correct. I don't remember.

11 Q Did Ms. Totten ever talk to about the lawsuit that  
12 she was named as a defendant in?

13 A I believe -- I believe she did. Yeah, she . . .

14 Q What was her reaction to being named in a lawsuit?

15 A I can't -- I can't remember. I know she wasn't  
16 happy. I know that.

17 Q Why did your brother feel that you had claims  
18 against your niece?

19 A What? Beg your pardon?

20 Q Why did your brother think you had claims against  
21 your niece?

22 A I don't know why he did all that. I don't know.  
23 Don't know.

24 Q Did you give him the information that he wrote in  
25 the complaint?



1 A I don't -- I don't -- I don't know how you -- I  
2 don't know if I did or, you know, if my wife got it  
3 or whatever. I don't know how -- I don't know. I  
4 don't know. I don't know what how -- I don't know  
5 how that came about. Don't remember.

6 Q Did you have any interactions with Ms. Totten's  
7 boyfriend?

8 A What do you mean "interaction"?

9 Q Did you have any dispute or arguments with  
10 Ms. Totten's boyfriend?

11 A Yes, we had -- yes, we had a whole lot of dispute.  
12 He was selling drugs out of my house.

13 Q Did you ever -- is that why you evicted your niece?

14 A No, he wasn't -- he -- I don't -- he wasn't even  
15 around then I don't think. I think he went back to  
16 prison. I think he might have been in prison.

17 Whatever reason why I put on the eviction  
18 is why I evicted her. So whatever the reason she  
19 put on there, you'd have to ask her, talk to her  
20 about that.

21 Q Did Ms. Totten ever make any false statements to  
22 the police?

23 A I don't know what she did. I believe she told the  
24 truth. I believe that -- that he tricked her  
25 because Jeffrey Conley was working undercover for

1 the same lie because they want to lie.

2 It don't take much for a person to lie,  
3 especially when you ain't got no food in your  
4 mouth. You ain't got nothing and you don't like  
5 somebody, they probably just get tired of how I am.  
6 And I think I -- people is so jealous, especially  
7 African American people. They jealous of each  
8 other. They hate to see each other win. And this  
9 is why we can't have nothing.

10 So they feel that I owe them something.  
11 I don't owe nobody nothing, me and my wife. My  
12 wife work every day. She still work every day.

13 Q Mr. Jones, who do you believe started this  
14 conspiracy to set you up?

15 A I -- I -- I -- you know, I have to say somebody --  
16 one of them girls. I don't know.

17 Honestly, I mean, I know one thing.  
18 They're lying on me. I sitting in this damn thing,  
19 and there ain't no way -- I ain't -- none of that  
20 never happened.

21 I don't even talk to none of them like  
22 that. I never had a conversation with none of  
23 these women. And that's the reason why -- that's  
24 the reason why -- that's the reason why ain't  
25 nobody never said none of this stuff before,

1       because it's a lie. You all should press charges  
2       on them. They the criminals.

3   Q   Mr. Jones, do you know when this conspiracy  
4       started?

5               MR. BOSCH: I'm going to object to the  
6       form of the question. He didn't say conspiracy,  
7       Counselor, you did.

8   Q   (MS. MURPHY) Do you know when these women made the  
9       determination that they were going to set you up?

10  A   Maybe when you all sent the letter out. Probably  
11       just sent that letter out. Because they ain't --  
12       listen. All them women just about been in front of  
13       lawyers. Talked to my lawyer. Talked to the  
14       judge. They ain't never called the police and told  
15       the police that, hey, Darrell Jones is trying to  
16       touch me on my ass or doing -- doing nothing to  
17       them. Ain't nobody never said none of that shit.

18               So you know yourself what you -- if you  
19       all were doing your homework you'd know it's a lie.  
20       But you didn't know I didn't -- couldn't read or  
21       write. They didn't know I couldn't read and write.  
22       They don't know nothing about me.

23               I kept it strictly business. You call  
24       me, you pay your money, I get my money and go. You  
25       don't pay me, you got to go. Simple as that.

1 I know for a fact if I was to do something, you  
2 know, they would call the police on me, you know.  
3 But, you know, a woman pull her clothes down, show  
4 me her vagina, then guess what? You know, they --  
5 you know, she's the hero. But if I do that to her,  
6 then I'm -- I'm -- I -- I committed a crime. The  
7 world is --

8 Q I'm sorry. Mr. Jones, let me ask my questions.

9 How many women have showed you their  
10 vagina?

11 A I don't know for exact. I don't know. I don't  
12 keep count. Don't even matter. I can tell you  
13 that people did.

14 Q But at least one tenant has showed you her vagina?

15 A Yeah.

16 Q Apart from Ms. Coleman's photo?

17 A Yeah. I can't say -- I'm going to say it like this  
18 to you. Females did a lot of inappropriate stuff,  
19 sexual stuff. Okay? I can't stop them from doing  
20 it.

21 Q I'm going to ask you again.

22 Apart from the photo of a vagina, have  
23 any tenants shown you their vagina in person?

24 A Listen to this. I'm telling you I used to go -- I  
25 used to go -- I'm going to tell -- I can't remember

1       who it was. I done seen a lot of stuff. That's  
2       why I don't go to people's doors. That's why I  
3       stay in my car. I come -- I come get the -- they  
4       call me, they're ready. I pull up at the curb,  
5       they got their -- they standing at the door with  
6       their titties out. You know what I'm saying? I  
7       done seen all kinds of stuff.

8   Q    Okay. So, Mr. Jones, just -- just so we're clear,  
9       the answer to my question about whether or not  
10      you've seen a tenant's vagina, it's yes?

11   A    I'm telling you I don't see a lot -- I can't say  
12      which one, who did it because I ain't put that in  
13      my mind. I'm strictly about getting my money,  
14      ma'am.

15   Q    It was a yes or no question, Mr. Jones. Can you --

16   A    And I gave -- and I answered that question the way  
17      I wanted to answer it to you to make you understand  
18      it the way I understand it in my mind.

19                I'm not trying to be rude, ma'am, just  
20      trying to tell you how I think. So I'm sorry if  
21      you didn't get what you're looking for.

22   Q    I think I understand your answer.

23                When this tenant showed you her vagina,  
24      did you tell your wife?

25   A    I tell my wife everything. We talk about

1 everything. That's why we do my business like I  
2 do. I tell my wife everything.

3 Q So if we asked --

4 A I don't think --

5 Q I'm sorry. Let me ask my question.

6 So if we ask your wife about whose vagina  
7 that you saw, she will know the answer?

8 A She might remember and she might not. You talking  
9 -- I'm talking about something that happened a long  
10 time ago. Ask her when you talk to her.

11 Q Have you ever seen any of your tenants' breasts?

12 A What?

13 Q Have you ever seen any of your tenants' breasts?

14 A I just told you tenants done did stuff like that,  
15 and then you talking about how to answer me. Yes.

16 I don't -- I can't -- you know, it's  
17 nothing. They called me to get their money. They  
18 stand in the door and they flash you. You know,  
19 it's like that's something, you know.

20 Q I'm sorry. Is your testimony that they're flashing  
21 you? So they're showing you --

22 A Yes.

23 Q -- their breasts on purpose?

24 A Yes. Yeah, I believe so. They call me and tell me  
25 come pick up money. I pull up front, they -- they

1 stand in the doorway -- and they know I'm coming --  
2 they flash them like that's something.

3 In this business --

4 Q Have any --

5 A -- you have no business saying shit, you know. You  
6 got to keep your mind straight.

7 Q Have any of the ten- -- have any of the women who  
8 have made claims against you in this lawsuit shown  
9 you their breasts?

10 A I don't know. I don't know. May have, may have  
11 not. I don't know.

12 I would have to know who they are. You  
13 know what I'm saying? A lot of stuff I put out of  
14 my mind, ma'am. I'm strictly about my own money.  
15 That's the only thing I'm interested in.

16 A lot of stuff I let go. A lot of men  
17 would probably laugh about it and think it's funny,  
18 but to me it's not.

19 I had a woman pull off clothes, her  
20 titties, her clothes off. I called the police.  
21 What did he do? He think that's funny. So I just  
22 stopped doing it. Stopped calling the --

23 Q Mr. Jones, when you have gone to women's homes and  
24 seen vaginas and breasts, has anyone else witnessed  
25 this?

1 Q How do you decide which properties to purchase?

2 A The Realtor show us real estate, show me a house,  
3 and I talk to my wife about it and tell her what I  
4 think we should pay. And I just decide if I want  
5 to bid on it or not. And I bid -- I tell her what  
6 I'll pay. And if I get it, I get it. If I don't,  
7 I don't. Cheap.

8 Q When you say bid, are you talking about purchasing  
9 properties that are in foreclosure?

10 A Yep. That's what I do.

11 Q Are all the properties you purchase, were they in  
12 foreclosure at the time you purchased them?

13 A Just about. Some houses we bought from the  
14 auction.

15 Q Do you always use the same Realtor, or do you use a  
16 different one?

17 A Different ones. We'll come along.

18 Q How do you learn about the properties?

19 A When the Realtor tell me -- tell me of them. I  
20 tell them what I'm -- how much I'm willing to  
21 spend, and he find me a house, you know. He call  
22 me on the phone and tell me to meet him, meet him,  
23 and I follow him to the house.

24 Q And is there a certain -- beyond the fact that  
25 they're in foreclosure, is there certain other



1 criteria that you use to determine which ones  
2 you're interested in?

3 A The cheaper, the better. Find me a cheap raggedy  
4 house, you know.

5 Q What about the amount of work that needs to go into  
6 the property?

7 A I get -- I get it done cheap. You know, people  
8 come, and I ask them do you know how to work on a  
9 house and whatever, and yeah.

10 Q The people that do the work, are they all  
11 contractors, or are any of them your employees?

12 A They -- they just -- they -- they go around -- none  
13 of them are employees. Just tell everybody come  
14 and do the work.

15 And I have contractors do priority,  
16 whatever. They do plumbing, licensed plumbing.  
17 Electrician. Licensed. I call them, and they give  
18 me a price, and, you know, I tell them what I'm  
19 going to pay to do the work.

20 Q Do you use the same people time and time again?

21 A Sometimes. It depends on the price, what they give  
22 me on the price. The cheaper the better.

23 Q Do you do any of the work on your properties  
24 yourself?

25 A I don't do nothing. I just got a -- I just look at

1 Q Mr. Jones, at one point -- actually, I think at a  
2 couple points -- you testified today that you  
3 believe you are a good landlord.

4 What makes you believe that you're a good  
5 landlord?

6 A Because I take care of all my houses. I take care  
7 of -- I'm a good landlord. I take care of my  
8 property. And I give everybody a house as long as  
9 they got the money, they can afford it. They got  
10 to have the income to afford it. I don't take them  
11 through all the -- the bull that everybody else  
12 might take them through. Tell them they got to  
13 have three times more in their income and all this  
14 other stuff. If you can afford my house, I can  
15 give you -- I'll give you a chance.

16 And I also tell them up front if you  
17 can't afford it -- you can't afford it and you  
18 don't pay me, I'm going to put you out. So they  
19 know up front. They know up front -- they know --  
20 they know up front that I ain't going to play with  
21 them. I got bills to pay.

22 Q Mr. Jones, am I correct that the application fee  
23 that you charge is \$75?

24 A That's correct.

25 Q What do you use that \$75 for?

1 A My wife for finding and checking on the people. It  
2 takes time to run a check on everybody. She, you  
3 know, check them out and make sure they're  
4 qualified for the place.

5 I talked to the lawyer, and he told me  
6 that's the most I can charge. So I feel, hey, we  
7 got the best houses.

8 We deal with the worst of the worst. And  
9 a lot of times people don't -- they be lying. She  
10 check them out. That ain't got the money or they  
11 don't work where they supposed to be working,  
12 that's time out of our day. So . . .

13 Q Do you run credit checks on everyone?

14 A I don't know what she does. You'll have to ask her  
15 that. But I know she checks them out, and she  
16 decides what she wants to do or whatever, and I --  
17 she tells me, yeah, I can tell them they got a  
18 house. Pay me the money. She tells me how much  
19 they got to give me, and that's that.

20 Q All right. Mr. Jones, it's my understanding that  
21 you -- your sister-in-law Nadra lives with you. Is  
22 that right?

23 A That's correct.

24 Q And you and Fatima help provide care to Nadra?

25 A That's correct.